

ATTACHMENT A

COUNT 1

(Procurement of Citizenship or Naturalization Unlawfully)

On or about March 13, 2024, in Monmouth County, in the District of New Jersey and elsewhere, defendant

ABHINANDAN VIG

knowingly procured and attempted to procure, contrary to law, the naturalization of a person, namely, himself, by way of false statements, in that he knowingly made materially false statements in an Application for Naturalization (Form N-400) signed under penalty of perjury on or about March 13, 2024, wherein defendant falsely represented that he had never voted in any Federal, state or local election in the United States.

In violation of Title 18, United States Code, Section 1425(a).

ATTACHMENT B

I, Craig T. Ulicni, a Special Agent with Homeland Security Investigations, having personally participated in an investigation of the conduct of defendant ABHINANDAN VIG (“VIG”), and having spoken with other law enforcement officers and individuals, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the actions, statements, and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint:
 - a. A United States citizen was a native of the United States; a person naturalized in the United States; or a person who derived U.S. citizenship (from one or both parents); and who owed allegiance to the United States and was entitled to its full rights, privileges, and protection.
 - b. An alien was any person not a citizen or national of the United States. This included immigrants (e.g. lawful permanent residents) and non-immigrants (e.g. individuals who were admitted to the United States for a temporary duration, such as a student, a visitor or a temporary worker).
 - c. A lawful permanent resident (“LPR”) was an alien who had been conferred permanent resident status in the United States (colloquially known as a “Green Card” holder). An Alien Registration Receipt Card (also known as a “Green Card”) was issued to lawful permanent residents as evidence of their status. Upon meeting the statutory prerequisites for naturalization, an LPR could apply to become a naturalized United States citizen.
 - d. In order to register to vote in the State of New Jersey, an applicant was required to certify and attest that they met certain eligibility requirements, including the requirement that he/she was a United States Citizen at the time that he/she registered to vote.
 - e. Upon successfully registering to vote in New Jersey, an applicant was authorized to vote in New Jersey State and local elections, as well as in federal elections.

f. VIG was a Lawful Permanent Resident living in Monmouth County, New Jersey, having entered the United States under an F43 classification in or around June of 2012 after emigrating from his country of birth, India.

2. In or around January 2016, VIG registered to vote in New Jersey.

3. Based on the information that VIG provided in his application, including his false statement that he was a United States citizen, VIG's application to register to vote was accepted, and he was successfully registered to vote in the State of New Jersey.

4. After he was successfully registered to vote, VIG voted in person in Monmouth County, in the general election held on or about November 8, 2016. The 2016 general election included the election for the offices of President and Vice President of the United States. VIG also voted in the general election held on or about November 3, 2020, via a mail-in ballot. The 2020 general election included the election for the offices of President and Vice President of the United States.

5. In or around December 2023, VIG again registered to vote in New Jersey.

6. On or about March 13, 2024, VIG submitted an online Application for Naturalization ("N-400") to the U.S. Citizenship and Immigration Services ("USCIS"). An N-400 is a United States government form that is submitted by LPRs to apply to become U.S. citizens through the naturalization process. The N-400 consists of a detailed questionnaire that requires the applicant to provide personal information, including but not limited to, biographical information, marital history, criminal records, and information concerning whether the applicant has ever registered to vote and/or voted in any federal, state, or local election. The questions on the N-400 are designed to allow USCIS to determine whether applicants meet requirements like good moral character, English proficiency, and knowledge of U.S. history/government, before they are approved for United States citizenship. If it is determined that an applicant has voted in a federal election his/her application for citizenship will be denied.

7. As part of that application, the N-400 further requires applicants to certify under penalty of perjury under the laws of the United States that the information they report in the N-400 is complete, true, and correct. VIG electronically signed the certification on or about March 13, 2024.

8. In the N-400 application that VIG submitted, VIG checked the “No” box in response to the question “[h]ave you EVER voted in any Federal, state, or local election in the United States?”